

**AFFIDAVIT IN SUPPORT OF THE ISSUANCE OF A COMPLAINT AND ARREST WARRANT**

I, Jeffrey A. Yesensky, being duly sworn, do hereby depose and state:

1. I am a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”) and I have been so employed since November 2005. I am currently assigned to a multi-agency child exploitation task force known as the Baltimore Maryland Child Exploitation Task Force. Since September 2009, my responsibilities in the FBI have primarily involved the enforcement of federal criminal statutes involving the sexual exploitation of children pursuant to Title 18, United States Code, Section 2251, *et seq.* As part of my training, I have attended numerous training classes regarding the Internet, on-line child pornography, Internet child enticement, child sex trafficking, and child sex tourism, and have consulted with my colleagues who have many years of experience investigating child pornography and child exploitation cases. I have also been the affiant on numerous prior search and arrest warrants.<sup>1</sup>

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<sup>1</sup> On May 8, 2014, in *United States v. Walter L. Williams* (C.D. Cal. 13-302-PSG), Special Agent Yesensky testified in a hearing regarding a border seizure and later warranted search of two laptop computers. In the search warrant affidavit, Special Agent Yesensky accounted for a delay in seeking the warrant due to an “oversight on my part due largely to demands of two forensic reviews that I was conducting concurrently of two computers in separate investigations, which each involved the review of hundreds of thousands of images.”

While testifying before the district court, Special Agent Yesensky was asked to explain the “context” for the referenced portion of his search-warrant affidavit. Special Agent Yesensky testified that, during the seizure, he was also giving priority to other matters, such as leading a task force responsible for assisting 18-20 victims of child prostitution.

In a May 9, 2014 written opinion, the district court judge wrote that he “[did] not find this additional statement to be credible” and that the new statement “contradicts” his prior testimony. The judge wrote: “How could Agent Yesensky have ‘overlooked’ his duty to procure a warrant while simultaneously ‘prioritizing’ other matters?” In response to the district court’s opinion, the United States Attorney’s Office for the Central District of California and the Child Exploitation and Obscenity Section of the Criminal Division of the United States Department of Justice filed a Motion for Reconsideration urging the judge, for a variety of reasons, to revisit the district court’s credibility finding as unsupported under the circumstances. The district court denied the Motion for Reconsideration on June 20, 2014.

On October 1, 2014, the Assistant Director in Charge (ADIC) of the FBI-Los Angeles Field Office (LAFO) memorialized LAFO’s finding that the district court opinion did not warrant referral to the FBI’s Office of Professional Responsibility for a lack of candor or any other investigative deficiency. In the executive summary of the non-referral statement, the ADIC wrote that, “The facts and circumstances of this case clearly indicate that SA Yesensky was not making any misrepresentation to the court. All prosecutors with intimate knowledge of the case disagree with the lack of credibility finding and supported the motion to reconsider that decision.”

The district court’s two Opinions, the Motion for Reconsideration (including the lead prosecutor’s sworn Affidavit), the FBI’s non-referral letter and executive summary, and the suppression hearing transcript are available to this Court upon request.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and am a law enforcement officer with the authority to execute arrest and search warrants issued under the authority of the United States.

3. This affidavit is made in support of a criminal complaint and arrest warrant for Andrew Joseph Stilling, Jr. ("STILLING") for violations of Title 18 U.S.C. §§ 2251(a) (Sexual Exploitation of a Child); and Title 18 U.S.C. §§ 2252(a)(2) & 2252A(a)(2) (Receipt or Distribution of Child Pornography).

4. The statements in this affidavit are based on information provided by FBI San Francisco agents, my training and experience, the training and experience of other law enforcement officers with whom I have had discussions, and my investigation of this matter. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation.

#### PROBABLE CAUSE

5. On December 4, 2024, the FBI Baltimore field office received information from the FBI San Francisco Field Office regarding an ongoing child exploitation investigation in California of the user of a social media account with screenname "Dew HasFun" and username "funMarylandjerk," whom they believed to be **Andrew Joseph Stilling, Jr. ("STILLING")**. Between approximately September 23, 2024, and December 1, 2024, an FBI online undercover agent (the "FBI UC") communicated with the user of a social media account "funMarylandjerk" (hereinafter, "funMarylandjerk"). I obtained copies of the investigative materials from the FBI San Francisco Field Office, including video screen captures of chats between the FBI UC and

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Since the issuance of the district court's opinion, Special Agent Yesensky has obtained over 60 federal search warrants for electronic accounts, digital devices, and residences in multiple district courts.

funMarylandjerk, reviewed these materials, and concluded that funMarylandjerk appeared to be producing, distributing, and possessing sexually explicit material of a minor female whom he claimed to be his minor stepdaughter (“Minor Victim”), among other things. Some relevant information observed during my review of these materials is summarized below in part.

6. On or about September 23, 2024, while operating in an online undercover capacity in a public group forum on a messaging application that was known for discussing and/or posting imagery associated with the sexual abuse of minors, the FBI UC observed funMarylandjerk in the group. FunMarylandjerk’s account profile picture depicted the bottom half of a Caucasian male’s face. FunMarylandjerk stated that he was from Maryland and that he had access to a child (“Minor Victim”).

7. On September 23, 2024, after observing the above group message by funMarylandjerk, the FBI UC initiated contact with funMarylandjerk via direct message on the social media platform, purporting to be the father of a daughter.

8. In messages with the FBI UC on September 24, 2024, funMarylandjerk expressed a sexual attraction to Minor Victim, whom he said was 17-years old; claimed he had seen Minor Victim naked; claimed to have secretly video recorded Minor Victim naked in the bathroom with his phone, and expressed an interest in ejaculating on Minor Victim while she slept, among other things. Some relevant messages of the chats between funMarylandjerk and the FBI UC between approximately September 24, 2024, and November 30, 2024, are summarized below:

a. In messages on September 24, 2024, in which they discuss “family taboo” interests, funMarylandjerk stated that, for him, it was “mostly fantasy, other than the occasional light groping or sneaking a pic or two.” Later in this chat, funMarylandjerk claims to have viewed Minor Victim naked. These messages read as follows:

FBI UC: Have you gotten to see her naked much?

funMarylandjerk: I have, a couple times. Great body, only complaint is her bush

FBI UC: She hasn't started shaving yet?

FBI UC: You ever been able to capture any pics of her naked?

funMarylandjerk: She shaved her legs & pits but not down there

funMarylandjerk: I had a bunch of pics and a shower video but deleted them when I need a last minute phone upgrade

FBI UC: Damn that sucks. Bet you regret that decision now lol

funMarylandjerk: I've got a pic of her sleeping that's not too bad

FBI UC: How'd you get a shower vid of her?

funMarylandjerk: Definitely regret deleting it

...

funMarylandjerk: [Hid] my phone in the laundry basket while on records

The above chat continued in later messages that read as follows:

FBI UC: How do you take your pics without her noticing?

funMarylandjerk: When she's asleep it's easy, when she's awake I act like I'm looking something up on my phone while talking to her

FBI UC: How about when she's naked? How do you pull off catching her?

funMarylandjerk: Hide my phone in the bathroom and set it to record then screenshot afterwards for photos

FBI UC: Does that work? She's not suspicious?

funMarylandjerk: Hasn't said anything yet, hold on. I'll try to get a live pic now of her sleeping real quick for you

funMarylandjerk: [Sent an image of Caucasian female with dark hair who appears to be unconscious, laying in a bed. The image was sent using the social media application's live photo function<sup>2</sup>]

b. On September 24, 2024:

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<sup>2</sup> The social media application has a Live Photo function that allows other users to see a photograph was captured in real time and not posted from the device's gallery or shared from another source.

funMarylandjerk: sent the following message: "One night If I get brave enough I want to try jerking off and cumming on her while she sleeps."

c. On September 26, 2024, funMarylandjerk sent the FBI UC approximately four images of Minor Victim, who appeared to be approximately 15- to 17-years old and appeared similar in appearance to the above-described apparent unconscious Caucasian female sleeping on a bed. One of these pictures appears to be taken inside a residence and, in the background of this picture, a light brown oak door, with what appears to be four panel design, is visible with an adjacent vertical sidelight window that contains a rectangular white window sticker on the bottom located along one side of the door. Continuing on September 26, 2024, funMarylandjerk and the FBI UC had the following exchange:

FBI UC: When was the last time you saw her pussy?  
funMarylandjerk: Maybe 2 months ago  
FBI UC: That's not bad at all. How'd you get to see it?  
funMarylandjerk: Hid my phone in a laundry basket in the bathroom while she was in the shower and set the video to record  
....  
FBI UC: But the video is gone somehow right?  
funMarylandjerk: Deleted it when was upgrading phone  
FBI UC: Yep that sucks man  
funMarylandjerk: Ima try to sneak a few new pics this weekend though

d. On October 25, 2024, funMarylandjerk sent a message to the FBI UC that read, "took a few new pics of her the other day" and was followed by a series of four images that depicted Minor Victim seated on a couch, wearing a t-shirt and short shorts, with her feet on the couch and her knees up in the air--. The vantage point of the camera is such that the focal point is the Minor Victim's genitals. One of these images is described below:

(i) File name "deee381b-bcd7-4909-98d3-a942b3a01c14": an image that depicts a close up of Minor Victim's clothed genital area with short shorts hiked up on Minor Victim's inner thigh; the image appears to be a cropped version of one of the other three images sent in this series.

e. On November 4, 2024, funMarylandjerk told the FBI UC he had new pictures of Minor Victim, and funMarylandjerk sent approximately nine images depicting Minor Victim in a bathroom and/or bathroom shower, nude, depicted from the waist up. All but one of these images depicted Minor Victim's bare breasts. These images were all taken from the same general vantage point, which had the camera pointed upward from a low-position and aimed at the

entrance/exit to the bathroom shower. When asked by the FBI UC how he produced the images, funMarylandjerk stated that he hid his phone in a laundry basket while it was video recording. FunMarylandjerk told the FBI UC that he obtained video of Minor Victim, but he would not share the video with the FBI UC. The FBI UC asked funMarylandjerk if he got to see Minor Victim's vagina or "ass" in the video, and funMarylandjerk replied, "Unfortunately not this time. Had my phone at a bad angle."

The above chat continued on November 4, 2024:

FBI UC: Was it the first time you've tried that?

....

funMarylandjerk: No did it before but deleted it when I had to take my phone to the Verizon store. [Smile tear-face emoji]

FBI UC: Better not have to take your phone to Verizon anytime soon lil

FBI UC: Lol

funMarylandjerk: That last time had her hairy pussy and her ass in it though

f. On November 30, 2024, funMarylandjerk sent a Live Photo of an erect male penis, said he was masturbating to "new pics" of Minor Victim, and asked the FBI UC if he wanted to see. FunMarylandjerk then sent a series of approximately eleven images that depicted Minor Victim naked, with some of the images depicting her exposed genitals, breasts, and buttocks. These images were in the same bathroom as seen in the above-described images of Minor Victim on November 4, 2024, and were taken from the same general vantage point, which had the camera pointed up from a low-position and aimed at the entrance/exit to the bathroom shower, and the foreground of the pictures is partially blocked as if the camera is being hidden. One of these images, is described below:

(i) File name "b7929014-4ac0-499b-8cc3-1c5657b97809": An image file that depicts Minor Victim standing naked with her left knee raised up, and her exposed genitals, which are slightly out of focus, the focal point of the image.<sup>3</sup>

g. The above chat continued on November 30, 2024, and funMarylandjerk claimed he produced the above-described images of Minor Victim earlier by hiding his phone on the bathtub with a couple of shirts around it while recording video while Minor Victim was in the shower. FunMarylandjerk also told the FBI UC that he ejaculated three times since he produced the video.

h. Later on November 30, 2024, funMarylandjerk sent a message to the FBI UC that read in part, "I might buy a hidden cam for her room so I can get her masturbating."

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<sup>3</sup> As compared to the other nude images of Minor Victim that were sent, the framing of this picture is consistent with an image that cropped out some of the background such that the exposed genitals are more of a focal point.

9. On December 1, 2024, pursuant to an administrative subpoena for information related to the account “funMarylandjerk,” the social media application provided records that listed the subscriber of this account as having the unconfirmed email address, “[Stilling’s email address]” and to be associated with an iPhone as recent as May 2024. Additionally, the social media application provided IP address connectivity for this user from approximately November 1, 2024, to November 30, 2024, that listed the user as frequently using IP Address 216.164.38.44, including a connection on November 30, 2024, at 14:53:20 UTC via remotePort 63669.

10. On December 5, 2024, pursuant to an Emergency Request for Information, the internet service provider, Subsentio, provided records for the subscriber assigned IP Address 216.164.38.44. on November 30, 2024, at 14:53:20 UTC via remotePort 63669. The records listed the subscriber to be [Stilling’s partner] and the service location to be [Stilling’s address].

11. On December 3, 2024, pursuant to an administrative subpoena, Google Inc. provided Google Pay<sup>4</sup> records for an account associated with the aforementioned email address that listed several credit cards in the name “ANDREW J. STILLING JR.”

12. Based on the above facts, on December 5, 2024, the Honorable Charles D. Austin signed search warrants authorizing the search of STILLING’s person and STILLING’s residence, and on December 6, 2024, these search warrants were executed by the FBI. Pursuant to this search warrant, the FBI seized several digital devices from inside STILLING’s residence, including an Apple iPhone 8 with Serial No. FFMVP6NYJC6C that belonged to STILLING (“STILLING’s iPhone 8”).

13. During the execution of the above search warrant, STILLING waived his Miranda Rights and provided voluntary statements to law enforcement officers. Following this initial

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<sup>4</sup> Google Pay is a mobile payment app that allows users to make contactless purchases in-stores and online.

interview, STILLING consented to an FBI polygraph exam, waived his Miranda Rights again, and provided additional voluntary statements to the FBI, including the following statements that are summarized below in part:

a. STILLING was the owner of the above-described iPhone 8, and was the user of the account “funMarylandjerk.”

b. On two occasions, in August 2024 or September 2024 and approximately a few weeks ago, STILLING hid his iPhone 8 in the bathroom of his residence to produce two nude videos of Minor Victim while she got undressed, took a shower, and got dressed. These nude videos depicted Minor Victim’s bare breasts, “ass,” and pubic area.

c. STILLING deleted the first video of Minor Victim because he knew it was wrong, and the second video of Minor Victim remained in the deleted file on his phone. Since deleting this second video of Minor Victim, STILLING accessed it on two or three occasions to view it.

d. On two or three occasions, STILLING attempted to masturbate while watching the nude videos of Minor Victim, but he was unable to maintain an erection and ejaculate because he felt guilty about looking at it.

e. STILLNG communicated on the social media application with the FBI UC and sent the FBI UC screenshots from both the above videos of Minor Victim in the shower – these screenshots depicted Minor Victim nude.

f. STILLING was shown a printout of image file “b7929014-4ac0-499b-8cc3-1c5657b97809,” which depicted Minor Victim’s exposed genitals and is described above as being sent by funMarylandjerk to the FBI UC on November 30, 2024. STILLING provided the following information that is summarized below:

g. STILLING identified the image as a screenshot he took from a video he created by hiding his iPhone in a pile of laundry in the bathroom and setting it to record. STILLING thereafter cropped this picture, which he noted to depict Minor Victim’s “area” while she was getting dressed. STILLING placed the phone in that location to capture Minor Victim’s vagina, and he subsequently cropped this picture to remove laundry, shampoo, and/or soap from the image.

h. In approximately August 2024 or September 2024, STILLING received a sexually explicit photo on his cell phone from an individual with whom he was chatting on the social media application that depicted a girl, approximately 5- to 8-years old, with her hand on an adult male’s erect penis.

i. STILLING was sexually attracted to Minor Victim, and he fantasized about having sex with her.

j. STILLING sent an image of Minor Victim to another adult user of the social media application with whom he last communicated in the past week, and this image was possibly a nude screenshot of Minor Victim from the first video he produced of Minor Victim in the bathroom.

14. A forensic extraction of the data contained on STILLING’s iPhone 8 was conducted by the FBI Computer Analysis Response Team, who created a report of this forensic extraction.

15. The review of the forensic extraction report for STILLING's iPhone 8 found the social media application was installed on the device, and this account was associated with screenname "Dew HasFun" and username "funMarylandjerk."

16. The review of the forensic extraction report for STILLING's iPhone 8 found the following media files on the device, which are summarized below in part:

a. Approximately eight sexually explicit image files depicting minor females, aged approximately 6- to 12-years old, including the following:

(i) File name "5745a4f0bd57862a787068b911de8d263b36be0f": an image that depicts a naked prepubescent minor female, aged approximately 6- to 8-years old, with her legs spread apart such that her bare vagina and anus are displayed. A fluid, apparently urine, is seen projecting from this minor's vagina.

(ii) File name "0b0a834210cbb35fb9570568e492e3c5c3971c35": an image that depicts a prepubescent minor female, aged approximately 6- to 8-years old, wearing no bottoms, laying on a bed with her legs spread apart such that her bare vagina is displayed.

(iii) File name "246330c5a927ee793a2850168ae06a12cf236d2b": an image that depicts a minor female, aged approximately 6- to 8-years old, holding an erect adult penis with her right hand while the tip of the penis is touching her tongue.

b. Approximately 20 image files of Minor Victim, seen nude or partially nude, in a bathroom with her bare breasts and/or vaginal area displayed, as well as the following sexually explicit material of Minor Victim:

(i) File name "cplAYr4rmbgo2UHuVN6bzK3pxjNsiC9.mov": a video, 17-minutes and 40-seconds long, that have an EXIF creation date of November 28, 2024, and depict Minor Victim naked, getting undressed, showering, and getting dressed in a bathroom.<sup>5</sup>

(ii) Two sexually explicit screenshots, file names "IMG\_7472.PNG" and "FullSizeRender.jpg," that are consistent with the above video, have an EXIF creation date of November 28, 2024, and depict Minor Victim's exposed genitals.<sup>6</sup>

17. The review of the forensic extraction report for STILLING's iPhone 8 found chat messages between STILLING, using account "funMarylandjerk," and users of the same social media application. Some of these chats are summarized below in part:

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<sup>5</sup> The EXIF data for this video also listed the file as being taken with an Apple iPhone 8 in the geographic area of STILLING's residence.

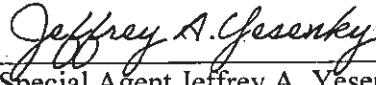
<sup>6</sup> File "FullSizeRender.jpg" appeared to be an edited version of "IMG\_7472.PNG" such that some of the surroundings were cropped out and Minor Victim's vaginal area was more of a focal point. Additionally, "FullSizeRender.jpg" is visually similar to file "b7929014-4ac0-499b-8cc3-1c5657b97809," which is described above as being sent by funMarylandjerk to the FBI UC in a message dated November 30, 2024.

a. Chat messages, dated between November 8, 2024 and December 6, 2024, with the FBI UC.

b. Chat messages, dated between November 6, 2024, and December 1, 2024, with the user of account "Eddie Kay." In messages, dated December 1, 2024, STILLING tells "Eddie Kay" he masturbating to pictures of Minor Victim and sent this user four pictures, apparently unsolicited, of Minor Victim who appears naked in the bathroom, including an image with file name "50639a79-3253-4def-9740-d17242ab71cc" that depicted Minor Victim's exposed genitals and is visually similar to the above sexually explicit file, "FullSizeRender.jpg."

#### CONCLUSION

18. Based upon the foregoing information set forth in this application, I respectfully submit that there is probable cause to believe that Andrew Joseph Stilling, Jr. violated Title 18, U.S.C. §§ 2251(a) (sexual exploitation of a child); and Title 18 U.S.C. §§ 2252(a)(2) & 2252A(a)(2) (Receipt or Distribution of Child Pornography). Accordingly, I request that a criminal complaint and an arrest warrant be issued.

  
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Special Agent Jeffrey A. Yesensky  
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) on this 7th day of February, 2025.

  
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Honorable Charles D. Austin  
United States Magistrate Judge